

Energy & Technology Committee Connecticut General Assembly Public Hearing – February 26, 2019

Re: Raised Bill No. 7155 – An Act Concerning Consumer Protections for Customers of Electric

Suppliers

LETTER TO SERVE AS WRITTEN TESTIMONY

Distinguished Members,

Starion Energy, Inc. ("Starion") is a retail electric and gas supplier that services residential, small business and commercial customers here in Connecticut as well as in eight other states and the District of Columbia. Starion is a Connecticut based business, which has been in operation for 10 continuous years with its current offices located in Middlebury, CT.

Starion strongly support consumer protections, but those protections must also work together to enhance the consumer's experience. Aside from amending the governing statute to allow the Public Utility Regulatory Authority to order the payment of restitution for any company for which it has jurisdiction over, the remainder of Raised Bill No. 7155 is overly prescriptive for statutory language and instead should be controlled by the administrative regulatory proceedings of PURA.

All stakeholders have been working together in the collaborative process to strengthen consumer protections associated with marketing and services provided by retail electric suppliers to residential customers in Connecticut in PURA Docket No. 14-07-20RE01. In fact, on June 7, 2017 PURA issued draft marketing standards which address many of the same concerns that are raised here. According to the Docket's Time Schedule, a Proposed Final Decision was tentatively scheduled for distribution on June 22, 2018. However, to date, no Decision has been issued. It is disingenuous to call on the legislature claiming that consumer protections advocated for in the regulatory process have not had the intended impact on the market stakeholders desired if those same provisions were never put into place.

Finally, Starion believes that overly prescriptive statutes on certain language, technologies and services will soon become outdated, requiring constant legislative updates. Unlike regulatory proceedings, statutes do not have the flexibility to adapt and evolve with technology and services. As such, it is more prudent and in the best interests of consumers and all stakeholders to allow the granular details of consumer protections to be addressed through administrative rulemaking proceedings before PURA.

Very truly yours, Alexandrea L. Isaac General Counsel